

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

THIS DOCUMENT RELATES TO:

The County of Summit, Ohio, et al. v.
Purdue Pharma L.P., et al.,
Case No. 18-op-45090

The County of Cuyahoga, Ohio, et al. v.
Purdue Pharma L.P., et al.,
Case No. 17-op-45004

City of Cleveland, Ohio, et al. v.
AmerisourceBergen Drug Corp., et al.,
Case No. 18-op-45132

MDL No. 2804

Case No. 1:17-md-2804

Judge Dan Aaron Polster

**RITE AID CORPORATION'S MOTION TO DISMISS
FOR LACK OF PERSONAL JURISDICTION**

Pursuant to Federal Rule of Civil Procedure 12(b)(2), Rite Aid Corporation ("RAC") respectfully moves this Court to dismiss Plaintiffs'¹ claims against RAC for lack of personal jurisdiction. FED. R. CIV. P. 12(b)(2). RAC refers the Court to the attached memorandum in support for a full statement of the bases for this Motion.

¹ The Plaintiffs are: the entities listed in paragraph one, footnote one of the Second Amended Complaint and Jury Demand filed by the County of Summit, Ohio, *et al.* (the "Summit Plaintiffs") on May 18, 2018 (the "Summit Complaint"); the entities listed in paragraph one of the Second Amended Complaint filed by the County of Cuyahoga, Ohio, *et al.* (the "Cuyahoga Plaintiffs") on May 18, 2018 (the "Cuyahoga Complaint"); and the entities listed in paragraph one of the Second Amended Complaint filed by the City of Cleveland, Ohio, *et al.* (the "Cleveland Plaintiffs") on May 18, 2018 (the "Cleveland Complaint"). The Summit Plaintiffs, Cuyahoga Plaintiffs, and Cleveland Plaintiffs are referred to collectively as "Plaintiffs."

Date: May 25, 2018

Respectfully submitted,

/s/ Elisa P. McEnroe

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CERTIFICATE OF SERVICE

I certify that the foregoing document and all of its attachments were electronically filed on May 25, 2018 with the Clerk of Court using the CM/ECF system, which will send notification of such filing to all registered users.

/s/ Elisa P. McEnroe

Elisa P. McEnroe